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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

**COMMENTS ON SOLUTIA'S DECEMBER 3, 1999, TSCA CELL DESIGN
SAUGET AREA 1 SITE**

December 30, 1999

1. Page 2, reference is made to the Removal Action Alternatives Evaluation submitted by Solutia on November 8, 1999. Based on recent discussions with representatives from a RCRA subtitle C disposal facility and the permitted dioxin incinerator, U.S. EPA disagrees with some of the cost estimates listed in this evaluation and therefore some of the cost comparisons for off-site disposal, off-site incineration and on-site disposal are possibly not accurate. For example, Solutia estimated the cost to be \$5.00 per pound at the incinerator, however, U.S. EPA was quoted a cost of less than \$2.00 per pound. U.S. EPA was also quoted a cost of \$85 per cubic yard for disposal at a RCRA subtitle C facility (TSCA permitted) which appears to be substantially lower than the cost estimates for disposal found in Solutia's Alternatives Evaluation. These differences in cost estimates are substantial and could possibly make the cost of the off-site options comparable to the on-site disposal option particularly when the costs for long-term operation and maintenance of an on-site disposal cell are taken into consideration.
2. Page 12, Section 4.4: The statement regarding starting work during "... a low precipitation period, e.g. July and August 2000." should be removed from the text. A time-critical removal action should be conducted as soon as possible, not when optimum weather conditions occur. The continental climate for the St. Louis area also does not always provide for "low precipitation" periods during the summer and therefore waiting for this event would waste time.

Also, in the same section, second paragraph, the discussion regarding Site M and the possibility of terminating the removal based on a time limit for addressing recharging groundwater does not make sense here. The UAO will also require the removal of sediments in both creek segment B and Site M. Dewatering will need to occur in Site M in order to conduct the removal and this must be factored into the design. Removing sediments from segment B and not Site M would likely result in further contamination of segment B after the removal.

3. Page 14, Section 5.2: Reference to a Village of Sauget ordinance prohibiting the use of groundwater as a water supply source should be included as an appendix to this report. At a minimum, U.S. EPA would appreciate a copy of this ordinance for its files.

Also, at the top of page 15, the statement that well owners only use the wells for lawn watering conflicts with the statement on page 7 which states: "...only one of the five wells located in this area is used occasionally as a source of drinking water and the other four wells are never used for this purpose."

Sgt1 - tsc